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The request for an extension to respond to plaintiff's complaint, and for an adjournment of the January 19 conference is GRANTED. No further extensions will be granted. The conference is adjourned to February 21 at 3:00 PM. Parties are directed to dial into the Court's teleconference line at 888-251-2909, access code 2123101. Parties are reminded to jointly submit, by one week prior to the conference, a proposed Case Management Plan and Scheduling Order.


January 10, 2024

**VIA CM/ECF**

Hon. Lewis J. Liman, U.S.D.J.  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *Charter Oak et al. v. Trisura*  
Case No.: 23-cv-06736  
Our File No.: 0595/436

SO ORDERED.

  
LEWIS J. LIMAN  
United States District Judge

Dear Judge Liman:

January 11, 2024

Our office represents defendant Trisura Specialty Insurance Company ("Trisura") in this action and respectfully writes for an additional extension of time, to February 9, 2024, to respond to plaintiff's complaint. Trisura's time to respond currently expires on January 12, 2024. Trisura also respectfully requests that the January 19, 2024 conference be held in abeyance, or adjourned to a date after February 9, 2024, along with the deadline to submit the Case Management Plan and Scheduling Order accordingly. The undersigned spoke with counsel for plaintiff Charter Oak who consents to this application.

The reason for the extension request is that Trisura is preparing to issue a second supplemental reservation of rights ("ROR") advising that Trisura is agreeing to defend all of Plaintiffs' insureds in the Underlying Action, subject to the ROR. If plaintiff reviews and agrees to the same, Trisura submits that this would result in the discontinuance of this action without prejudice.

This is the fourth extension of time requested by Trisura with respect to its answer, with the first three having been granted by Your Honor and the second request for the conference, with the first also having been granted (Docket #19). There presently is one scheduled conference (January 19, 2024) which Trisura requests be held in abeyance as set forth above. I thank the Court for the consideration of this request.

Respectfully submitted,

Michael F. Panayotou

Cc: *All Counsel of Record by CM/ECF*